

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TECHNIPLAS, LLC,
et al.,

Debtors.¹

Chapter 11

Case No. 20-11049 (LSS)

(Jointly Administered)

Hearing Date: July 22, 2020 at 2:00 p.m. (ET)²

Objection Deadline: July 15, 2020 at 4:00 p.m. (ET)

**NOTICE OF MOTION OF THE DEBTORS FOR ENTRY OF AN ORDER (I) TO
REJECT CERTAIN EXECUTORY CONTRACTS, (II) TO REJECT CERTAIN
UNEXPIRED LEASES, (III) TO ABANDON CERTAIN PERSONAL PROPERTY,
AND (IV) TO AUTHORIZE AND APPROVE PROCEDURES TO REJECT
EXECUTORY CONTRACTS AND UNEXPIRED LEASES**

TO: (I) THE U.S. TRUSTEE; (II) THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS; (III) THE CONTRACT COUNTERPARTIES; (IV) THE LANDLORDS; (V) THE PURCHASERS; (VI) BANK OF AMERICA, N.A. AS THE PREPETITION ABL AGENT AND DIP ABL AGENT; (VII) U.S. BANK N.A. AS THE PREPETITION NOTES AGENT; (VIII) THE AD HOC GROUP; (IX) WILMINGTON SAVINGS FUND SOCIETY, FSB AS THE INTERIM FINANCING AGENT AND DIP TERM AGENT; AND (X) ANY SUCH OTHER PARTY ENTITLED TO RECEIVE NOTICE PURSUANT TO BANKRUPTCY RULE 2002.

PLEASE TAKE NOTICE that the debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”) have filed the attached *Motion of the Debtors for Entry of an Order (I) to Reject Certain Executory Contracts, (II) to Reject Certain Unexpired Leases, (III) to Abandon Certain Personal Property, and (IV) to Authorize and Approve Procedures to Reject Executory Contracts and Unexpired Leases* (the “**Motion**”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Techniplas, LLC (7921); DMP Monterrey Holdings LLC (5888); DMP International Holdings, LLC (5922); Nyloncraft, Inc. (6035); Nyloncraft of Michigan, LLC (9613); DMP Exports Inc. (2366); Techniplas Finance Corp. (8207); and WEIDPLAS North America, LLC (6945). The address of the Debtors’ corporate headquarters is N44 W33341 Watertown Plank Road, Nashotah, Wisconsin 53058.

² This hearing will be held telephonically and by videoconference. All parties wishing to appear must do so telephonically by contacting COURTCALL, LLC at 866-582-6878 no later than July 22, 2020 at 8:30 a.m. to register. Additionally, any parties that will be arguing or testifying must appear by Zoom for video and CourtCall for audio in accordance with the instructions set forth in the Notice Regarding Videoconferencing During The Implementation of COVID-19 Court Procedures and Delaware Bankruptcy Court Video Appearance Procedures. The Debtors will file a Notice of Agenda prior to the hearing containing a Zoom link for the hearing.

PLEASE TAKE FURTHER NOTICE that any objections to the Motion must be filed on or before **July 15, 2020 at 4:00 p.m. (ET)** (the “**Objection Deadline**”) with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, you must serve a copy of the objection upon the undersigned proposed counsel to the Debtors so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE MOTION WILL BE HELD ON JULY 22, 2020, AT 2:00 P.M. (ET) BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 6TH FLOOR, COURTROOM NO. 2, WILMINGTON, DELAWARE 19801.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THEN THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR A HEARING.

[Remainder of Page Intentionally Left Blank]

Dated: June 30, 2020

Respectfully submitted,

FOX ROTHSCHILD LLP

/s/ Daniel B. Thompson

Jeffrey M. Schlerf (No. 3047)

Carl D. Neff (No. 4895)

Daniel B. Thompson (No. 6588)

919 North Market Street, Suite 300

Wilmington, DE 19801

(302) 654-7444

jschlerf@foxrothschild.com

cneff@foxrothschild.com

danielthompson@foxrothschild.com

David M. Turetsky (admitted *pro hac vice*)

Andrew T. Zatz (admitted *pro hac vice*)

WHITE & CASE LLP

1221 Avenue of the Americas

New York, NY 10020

(212) 819-8200

david.turetsky@whitecase.com

azatz@whitecase.com

and

Fan B. He (admitted *pro hac vice*)

Robbie T. Boone Jr. (admitted *pro hac vice*)

WHITE & CASE LLP

200 South Biscayne Boulevard

Suite 4900

Miami, FL 33131

(305) 371-2700

fhe@whitecase.com

robbie.boone@whitecase.com

*Counsel to Debtors and
Debtors-in-Possession*